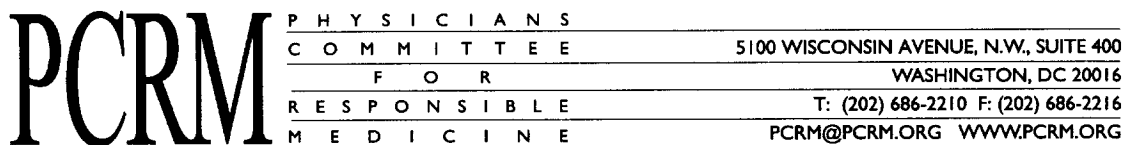


201-15581



September 9, 2004

Michael O. Leavitt, Administrator  
US Environmental Protection Agency  
Ariel Rios Building  
Room 3000, #1101-A  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

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Subject: Comments on the HPV test plan for the Quats category

Dear Administrator Leavitt:

The following comments on the Quat HPV Challenge Task Group (QTG) test plan for Quats are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

QTG submitted its test plan on April 27, 2004 for the chemicals Dimethylaminoethylacrylate (ADAMMC, CAS RN 44992-01-0), Dimethylaminoethylacrylate dimethylsulfate (ADAMDMS, CAS RN 13106-44-0), Dimethylaminoethylmethacrylate methylchloride (MADAMMC, CAS RN 5039-78-1), and Dimethylaminoethylmethacrylate dimethylsulfate (MADAMDMS, CAS RN 6891-44-7). By using data from these chemicals and other similar chemicals [Dimethylaminoethylacrylate (ADAM) or Dimethylaminoethylmethacrylate (MADAM)], QTG has been able to creatively bridge gaps in SIDS endpoints for the two HPV chemicals in question. Since the methylchloride and methylsulfates are expected to be less toxic than the amines, a screening level program such as the HPV program does not require additional animal testing for the bridged data points (repeat-dose, reproductive, and developmental toxicities).

We concur that no additional animal testing is necessary under the scope of the HPV program. Thank you for your attention to these comments. I may be reached at 202-686-2210, ext. 335, or via e-mail at [kstoick@pcrm.org](mailto:kstoick@pcrm.org).

Sincerely,

Kristie M Stoick, M.P.H.  
Research Analyst

Chad B. Sandusky, Ph.D.  
Director of Research